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11 Attorneys for Defendant-Counterclaimant  
12 FREESCALE SEMICONDUCTOR, INC.

13  
14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **OAKLAND DIVISION**  
17

18 MEDIATEK INC.,

19 Plaintiff,

20 v.

21 FREESCALE SEMICONDUCTOR, INC.,

22 Defendant.

Civil Action No. 4:11-cv-05341 (YGR)

**STIPULATED REQUEST TO  
EXTEND THE DEADLINE FOR  
DISPOSITIVE AND DAUBERT  
MOTIONS BY 3.5 HOURS**

Hon. Yvonne Gonzalez Rogers

1 In accordance with Civil Local Rules 6-1, 6-2, and 7-12, Defendant Freescale  
2 Semiconductor, Inc. (Freescale) requests that the court extend by 3.5 hours (from midnight,  
3 November 5, 2013, until 3:30 a.m. on November 6, 2013) the filing deadline for the dispositive  
4 and Daubert motions. Plaintiff MediaTek, Inc. (MediaTek) and Freescale stipulate to this request.

5 This stipulated request is supported by the following facts:

6 • Freescale began filing its Motion to Exclude the Testimony of Catherine M.  
7 Lawton (and Stipulated Administrative Motion to File Documents Under Seal) and its Motion for  
8 Summary Judgment (and Stipulated Administrative Motion to File Documents Under Seal) on  
9 November 5, 2013, at 11:16 p.m. PT.

10 • Freescale successfully completed the filing of its Motion to Exclude the Testimony  
11 of Catherine M. Lawton (and Stipulated Administrative Motion to File Documents Under Seal)  
12 on November 6, 2013 at 12:36 a.m. PT;

13 • Freescale successfully completed the filing of its Motion for Summary Judgment  
14 (and Stipulated Administrative Motion to File Documents Under Seal) on November 6, 2013 at  
15 3:13 a.m. PT;

16 • Freescale has informed MediaTek that the motions were filed late due to technical  
17 issues Freescale encountered with the Electronic Case Filing system;

18 • Freescale has informed MediaTek that had technical issues not been encountered  
19 with the Electronic Case Filing system, both Motions would have been filed before the  
20 November 5, 2013, deadline;

21 • Freescale will file, in support of this stipulated request, accompanying sworn  
22 declarations showing that Freescale encountered technical issues with the ECF system that  
23 delayed the filing;

24 • The parties agree that good cause exists for the requested 3.5 hour extension;

25 • The parties conferred regarding this request on November 6 and 11, 2013;

1           • Pursuant to Civil L. R. 6-2, Freescale requests that this Court order, by signing  
2 below, that the deadline to file the dispositive and Daubert motions is extended by three and a  
3 half hours, to 3:30 a.m. on November 6, 2013, and Freescale and MediaTek stipulate to this  
4 request.

5           IT IS SO STIPULATED.

6  
7 Dated: November 12, 2013

Respectfully Submitted,

8           FREESCALE SEMICONDUCTOR, INC.

9           By its attorneys,

10           By: /s/ Alexander J. Hadjis

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            Attorneys for Defendant-Counterclaimant  
FREESCALE SEMICONDUCTOR, INC.

1 Dated: November 12, 2013

Respectfully submitted,

2 MEDIATEK INC.

3 By its attorneys,

4 /s/ Keith L. Slenkovich

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21 Attorneys for Plaintiff

22 MEDIATEK INC.

23 **ATTESTATION OF E-FILED SIGNATURE**

24 I, Rudy Y. Kim, am the ECF User whose ID and password are being used to file this  
25 Stipulated Request. In compliance with General Order 45, X.B., I hereby attest that Alexander J.  
26 Hadjis and Keith L. Slenkovich have concurred in this filing.

27 Dated: November 12, 2013

/s/ Rudy Y. Kim

Rudy Y. Kim